

## **REMARKS**

Claims 15-30 are pending in the patent application. Claims 15 and 23 have been amended. No new matter has been added.

Claims 15-23, 25, 27, and 29-30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bayless in view of Rosecrans. The Applicant respectfully traverses the rejections.

Three criteria must be met to establish a prima facie case of obviousness. First, there must be some suggestion of motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference. Second, there must be a reasonable expectation of success. Finally, the cited reference, or a combination of references, must teach or suggest all the claim limitations. MPEP § 2142. The Applicant respectfully traverses the rejection because the cited references fail to disclose all the claim features.

Bayless discloses a method for displaying the local time, and the location of a calling party of a telephone call for the benefit of a user of the system. Moreover, Bayless merely teaches a computer telephone system that can be used to display e.g., the name and number of a user. In the method disclosed by Bayless, at least a portion of the ANI or Caller ID data is used to access database information to determine the place of origin and the local time of the calling party. The local time and place is then displayed to the user of the system.

The Office Action appears to suggest that Bayless discloses a move occurring from one main category of the graphic memory to another main category; and within a desired main category a move occurring between subcategories and/or members of the main category. The Applicant respectfully disagrees.

The claims have been amended to further distinguish the present invention from the cited references. In the amended claims at least one of a subcategory and a main category comprises at least one graphic image corresponding to a connection code. For example, a main category may be 'People' and a subcategory 'Relatives'. The

subcategory 'Relatives' then comprises graphic images relating to relatives. Bayless fails to teach or suggest such a solution.

Rosecrans fails to teach what Bayless lacks. Rosecrans discloses a graphic user interface, a telephone and a method of using a graphic identifier with an electronic phonebook in a telephone. The interface enables users to send stored graphical information, tied to selected phone numbers, to other users' phones for use or storage, by scrolling through stored graphics, displayed by the Interface on the phone, to locate a graphic associated with a person or place to be called, and then, by pressing the SEND, the particular phone number or numbers linked to the selected graphic are activated and the call or calls are made.

In summary, Rosecrans enables users of a telephone to scroll through graphics displayed on a display of the phone, to find the desired recipient and establish a call to a number linked to the desired graphic by selecting the desired recipient. Therefore, Rosecrans merely teaches a solution in which names displayed on the display of a telephone are replaced with graphic identifiers. When a call is to be established, a user must traverse through the graphics one by one in order to find the desired graphic.

Based on the above, neither Bayless nor Rosecrans teaches the feature of *'moving from one main category of said graphic memory to another main category, and within a desired main category, moving between at least one of subcategories and members of said main category; wherein at least one of a subcategory and a main category comprises at least one graphic image corresponding to a connection code'*.

Furthermore, the present invention may be implemented as a single entirety or as a distributed solution.

For at least the reasons set forth above, the Applicant asserts that the proposed combination of Bayless and Rosecrans does not disclose all the features taught in the Applicant's claimed invention as set forth in the amended independent claims 15 and 23.

Further, dependent claims 16-22, 25, 26, 29-30, which are dependent from independent claims 15 and 23, respectively, were also rejected under 35 U.S.C 103(a) as being unpatentable over Bayless in view of Rosecrans. While the Applicant does not

acquiesce to the particular rejections to these dependent claims, it is believed that these rejections are moot in view of the remarks made in connection with the independent claims 15 and 23. These dependent claims include all of the features of the base claim and any intervening claims, and recite additional features which further distinguish these claims from the cited references.

Further, dependent claims 24, 26 and 28, which are dependent from independent claim 23, respectively, were also rejected under 35 U.S.C 103(a) as being unpatentable over Bayless in view of Rosecrans as applied to claim 23, and further in view of Iwata (US 6,009,338). While the Applicant does not acquiesce to the particular rejections to these dependent claims, it is believed that these rejections are moot in view of the remarks made in connection with the independent claim 23. These dependent claims include all of the features of the base claim and any intervening claims, and recite additional features which further distinguish these claims from the cited references.

### **CONCLUSION**

In view of the amendments and reasons provided above, it is believed that all pending claims are in condition for allowance. The amendments clarify the patentable invention without adding new subject matter. Applicant respectfully requests favorable reconsideration and early allowance of all pending claims.

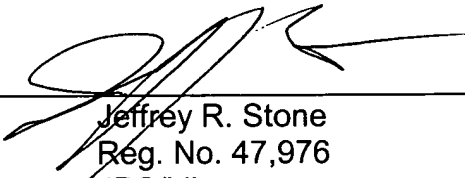
If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Applicant's attorney of record, Michael B. Lasky at (952) 253-4106.

Respectfully submitted,

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**Appendix A**  
**Marked Up Version of the Entire Claim Set**

**Technology Center 2600**

Claims 1-14 (cancelled)

15. (Currently amended) A method in conjunction with making a telecommunication call, the method comprising,

storing connection codes on a connection code memory;

storing graphic images on a graphic memory, said graphic images identifying owners of said connection codes;

displaying graphic images on a display of a telecommunication terminal arrangement while browsing directly or indirectly at least partly through said graphic images stored on said graphic memory of said telecommunication terminal arrangement to locate a desired graphic image, wherein while browsing said graphic images identifying said owners of said connection codes on said display, moving from one main category of said graphic memory to another main category, and within a desired main category, moving between at least one of subcategories and members of said main category; wherein at least one of a subcategory and a main category comprises at least one graphic image corresponding to a connection code; and

establishing a telecommunication call with a transmitter included in said telecommunication terminal arrangement to a connection code connected to said desired graphic image displayed on said display.

16. (Original) The method according to claim 15, further comprising:

storing audio signals on an audio memory linked to said graphic memory;

playing at least one audio signal with each graphic image while browsing said graphic images.

17. (Original) The method according to claim 15, wherein a graphic image is at least one of color and black and white information.

18. (Original) The method according to claim 15, wherein a graphic image fills a significant part, advantageously 50 - 100 %, of said display of said telecommunication terminal arrangement.

19. (Original) The method according to claim 15, wherein the indirect, at least partial browsing of said connection codes is performed by at least partially browsing said graphic memory linked to a connection code memory.

20. (Original) The method according to claim 15, wherein the direct, at least partial browsing of said connection codes is performed by at least partially browsing a connection code memory linked to said graphic memory.

21. (Original) The method according to claim 15, wherein within said graphic memory, a move occurs to the next graphic image by touching or pressing a graphic image or by other means.

22. (Original) The method according to claim 15, that wherein after a specific delay controlled by a delay unit, said displayed graphic image is replaced by the next graphic image.

23. (Currently amended) A telecommunication terminal arrangement, which comprises:  
a transmitter;

    a connection code memory in which a plurality of connection codes is stored;

    a graphic memory in which a plurality of graphic images is stored, said graphic images identifying owners of said connection codes;

    means of searching used to locate a desired graphic image in said graphic memory, wherein said graphic memory is linked to function together with said connection code memory so that while directly or indirectly browsing said graphic images, said arrangement displays graphic images related to said owners of said connection codes on at least one of a display included in said arrangement and a display connected to said arrangement, wherein the graphic memory comprises a hierarchic menu structure, which comprises several main categories, and said main categories comprise at least one of one or more subcategories and members of said

main category; wherein at least one of a subcategory and a main category comprises at least one graphic image corresponding to a connection code; and

means of commanding used to command said transmitter to establish a telecommunication call to a connection code connected to said desired graphic image displayed on said display, the connection code being retrieved from said connection code memory.

24. (Original) The arrangement according to claim 23, wherein the main categories of said menu structure include at least one of the following main categories: health care services, authorities, relatives, friends, stores, financial institutions.

25. (Original) The arrangement according to claim 23, wherein said display is a touch, pressure, or otherwise sensitive display which also forms said means of commanding.

26. (Original) The arrangement according to claim 23, wherein the arrangement is formed into a single entirety advantageously in the form of a bracelet, which comprises said means, which are a transmitter, a connection code memory, a graphic memory, means of searching, means of commanding, at least one of a display and a display connector, at least one of earphones and an earphone jack, and at least one of a microphone and a microphone connector.

27. (Original) The arrangement according to claim 23, wherein said display, which advantageously is a television, is a unit separate from said integrated entirety comprising a transmitter, a connection code memory, a graphic memory, means of searching, and means of commanding, and which unit is connected by wire or wirelessly to an integrated entirety.

28. (Original) The arrangement according to claim 23, wherein the arrangement is realized using a cellular phone operating in at least one of a GSM, DCS, CDMA, UMTS or WCDMA system.

29. (Original) The arrangement according to claim 23, wherein the arrangement is realized using a digital television terminal device.

30. (Original) The arrangement according to claim 23, further comprising:  
an audio memory in which audio signals have been stored, wherein the graphic memory is linked to function together with said audio memory, and whereby said graphic memory and audio memory form a memory device which includes multimedia-type graphic and audio information.